VINSON & ELKINS

FIRST CITY CENTRE

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TELEPHONE 512 495 8400

DALLAS, TEXAS 78201-2016 TELEPHONE 214 979-8600

47 CHARLES ST. BERKELEY SQUARE LONDON WIX 7PB, ENGLAND TELEPHONE OI 44I 49I-7236 CABLE VINELAINS LONDON NI. TELEX 24IAO

3,471

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October 17, 1986

Mr. Larry Soward, Director Texas Water Commission P. O. Box 13087 Capitol Station Austin, Texas 78711

> Re: Nalco Chemical Company RCRA Docket No. VI-508-H

Dear Mr. Soward:

3300 FIRST CITY TOWER 1001 FANNIN HOUSTON, TEXAS 27002-6760

TELEPHONE 713 651-2222 CABLE VINELKINS TELEX 762146

THE WILLARD OFFICE BUILDING 1455 PENNSYLVANIA AVE N.W. NASHINGTON, D. C. 20004-1007 TELEPHONE 202 639-6500 TELEX 89660

Pursuant to paragraph 4 of the compliance schedule of the May 30, 1986 consent agreement entered between the United States Environmental Protection Agency and Nalco Chemical Company in the referenced matter, enclosed are copies of the analytical results of representative samples taken of sludge, sediment accumulated in the bottom of the surface impoundment, and of soil underlying the surface impoundment.

The report with the sample identifier 0-10" is an analysis of the control sample taken from an inactive area of the Odessa facility 0 to 10 inches below the surface. The report identified as 10-20" is the analysis of the sample taken 10 to 20 inches below the bottom of the concrete impoundment in the north corner of the impoundment. The concrete is approximately 6 inches thick so the sample represents soil 4 to 14 inches below the surface. The report labeled 20-30" is an analysis of soil samples from 20 to 30 inches below the surface of the impoundment, same location.

Under separate cover, these analyses have also been forwarded to Carla Nelson, U. S. EPA Region VI.

If you have any questions regarding the analyses, please call Leo Domzalski at (312) 961-9500, extension 1284.

Sincerely,

Jeff Civina

Jeff Civins

JC:sg Enclosures cc: Carla Nelson Audrone Karalius Leo Domzalski



October 1, 1986

Mr. Odland Karstan Nalco Chemical 1 Nalco Center Naperville, IL 60566-1024

Dear MR. Karstan:

We at CompuChem® are pleased to provide our report for the analysis you requested. Data for the following sample are enclosed:

Your ID Number	Our ID Number	Analysis Code	Order Number	Description of Work Requested	Report Format

20-30"	100335	043	9250	Base/Neutral	Silver

In this report we have included the analytical results, the method reference, and the quality control summary. If any anomalies were encountered in this analysis, they would be referenced in an attached Quality Assurance Notice(s). Instrument documentation is provided with reports purchased in our Gold Report format.

To obtain additional technical information concerning this report, please contact your Sales Representative. In addition to resolving your questions, they can provide you with a complete overview of our line of services and assist you in identifying those services which will effectively and efficiently support your monitoring program.

For your convenience, your Customer Service Representative can help you place a new order, obtain information about a sample's status or obtain assistance with sample logistics. Your Sales Representative and your Customer Service Representative can be reached at 1/919-549-8263.

Thank you for choosing CompuChem®. We would like to continue providing you analytical support and services. We would appreciate your comments regarding the quality of services you have received from CompuChem®; client satisfaction is important to us. Please address your comments to Mr. Kevin McConnaghy, Vice-President of Marketing, at the address given below.

Sincerely,

Mary E. Mitchell

Supervisor, Report Deliverables

cc: Accounting

(Cover letter only)

COMPUCHEM LABORATORIES, INC. · P.O. Box 12652 - 3308 Chapel Hill/Nelson Highway · Research Triangle Park, NC 27709 · (919) 546-8263



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Chronicle

Method Reference

Data Summary

Base/Neutral Extractables

Quality Control Summary

Quality Assurance Notices*

Chain of Custody**

*These notices are included where appropriate for data qualification.

**When the original chain of custody is submitted with the sample(s), a copy of it is included with the report.



ANALYTICAL REPORT OF DATA SUBMITTED TO:

Mr. Odland Karstan Nalco Chemical 1 Nalco Center Naperville, IL 60566-1024

CHRONICLE

ITEM NO.		COMPUCHEM® NUMBER	DATE SAMPLE RECEIVED	DATE SAMPLE EXTRACTED	DATE BASE/NEUTRAL FRACTION ANALYZED
1.	20-30"	100335	09/09/86	09/11/86	09/16/86

METHOD REFERENCE

For the initial sample preparation, CompuChem employs a modification of the current EPA Contract Laboratory Program (CLP) procedure for the Determination of Low Levels of Semivolatile Organics in Soil and Sediments. Further sample preparation, specifically the extract partitioning technique, is taken from the second edition of "The Test Methods For Evaluating Solid Waste", SW-846. Analysis for the acid and base/neutral priority pollutants is performed in accordance with USEPA Method 625 Volume 49, October 26, 1984.

Method Summary

A nominal amount of sample, approximately 30 grams, is mixed with (anhydrous) sodium sulfate and serially extracted with a 50/50 mixture of methylene chloride and acetone using sonication. The solvent extract is then concentrated and partitioned into seperate base/neutral and acid extracts. The base/neutral extract is generated by washing the solvent extract with a basic (pH greater than 11) water wash which removes the acid constituents from the organic extract. The organic extract, now containing only base/neutral compounds, is then dried and concentrated. The pH of the aqueous basic wash is adjusted to less than 2 and serially extracted with methylene chloride. The methylene chloride containing the acid compounds is dried and concentrated.

Qualitative identification is performed using the retention time and the relative abundance of three characteristic ions. Quantitative analysis is performed using either external or internal standard techniques.

COMPOUND LIST -- BASE-NEUTRAL EXTRACTABLES

SAMPLE IDENTIFIER: 20-30"
COMPUCHEM® SAMPLE NUMBER: 100335

		CONCENTRATION (UG/KG)	DETECTION LIMIT (UG/KG)
18.	NAPHTHALENE	BDL	330
2B.	ACENAPHTHYLENE	BDL	330
3B.	FLUORENE	BDL	330
48.	PHENANTHRENE	BDL	330
58.	DI-N-BUTYLPHTHALATE	BOL	330

<u>Surrogates Recoveries</u> - Introduced at the beginning of the extraction, surrogate standards are deuterated and/or select compounds that analytically mimic the response of certain analytes. Known concentrations of these surrogates are added to the sample and a percent recovery is calculated. This recovery acts as a barometer of extraction efficiency and analytical response for the individual sample.

	*Recovery	Control Range%
D ₅ -Nitrobenzene	90	(20-140)
2-Fluorobiphenyl	94	(20-140)
D ₁₄ -Terphenyl		(20-150)
D ₁₀ -Pyrene*	92	

BDL=BELOW DETECTION LIMIT

^{*}Advisory Surrogate; therefore no control range.

QUALITY CONTROL SUMMARY

SAMPLE IDENTIFIER: 20-30"
COMPUCHEM® SAMPLE NUMBER: 100335

BASE/NEUTRAL

	NUMBER	ACCEPTANCE CRITERIA
Blank	101011	OK
Sample Spike	99884	OK
DFTPP*	DG860915B07	OK
Shift Standard	BT860915B07	OK

 $\mbox{\tt ^{*}The}$ tuning calibration compound, Decafluorotriphenylphosphine, is used for the base/neutral instruments.

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